

GENERAL POLICY STATEMENT DEVOS GROUP

1. Devos Group Code of Conduct

Sorting, packaging and trading of fresh fruit according to 'best practices' and by making economically responsible use of the most advanced techniques, to achieve the best possible quality, in accordance with legal food safety standards, sector-specific requirements, customers specifications and sustainable and responsible entrepreneurship (= ethical and with respect for the environment and climate). Every year Devos Group formulates measurable objectives to achieve positive evolution. To accomplish this, the necessary resources (staff, information & financial resources) are available.

Devos Group ambitions continuous improvement through short follow-up and frequent evaluation (internal and/or external) of the implementation of each of the topics below. Irregularities are, after analyzing, adjusted by implementing both corrective and preventive measures, including updating the procedures and working methods if necessary.

2. Code of conduct for suppliers/subcontractors

Devos Group expects that every supplier/subcontractor adheres to the same code of conduct as Devos Group itself, more specifically described in the topics below. Each supplier/entrepreneur will appoint at least one person in his company who will manage these topics. At the request of Devos Group, the supplier/subcontractor can demonstrate that these requirements have been implemented to the extent applicable to the products/services supplied. The signed supplier declaration confirms this commitment.

3. General

- ✓ Compliance with local and European legislation.
- ✓ Compliance with legislation in the country of destination regarding the traded product.
- ✓ Meeting specific customer requirements.
- ✓ Identification of all stakeholders (interested parties: staff, local residents, customers, suppliers, public, associations, etc.) and sector-specific issues. Including identifying and measuring the direct and indirect potential impact on the human rights of stakeholders. Negative impact of the Devos Group company on the human rights of their stakeholders are dealt with effectively means of an action plan that includes remedial measures.
- ✓ Devos Group has a transparent system for confidentially reporting and handling consequences on human rights without reporters fear of reprisals.

4. Quality

- ✓ Adapted infrastructure and application of advanced installations and technologies
- ✓ Purchase of quality fruit and packaging materials
- ✓ Quality monitoring during long- and short term storage, sorting & packaging
- ✓ Procedures and working methods (described in the quality manual), which evolve changing production conditions and legal requirements
- ✓ Devos Group employees are involved in the business strategy and encouraged in the continuous improvement process
- ✓ Aligning packaged quality with customer expectations

- ✓ Transport in accordance with the fruit-quality requirements
- ✓ Registration of incidents, complaints and corrective measures
- ✓ Frequent internal- and external evaluations including adjustments
- ✓ Progress reporting to management and staff
- ✓ Verification of quality manual

Devos Group has appointed managers who monitor the quality throughout the process, starting from 'reception of purchased goods' to 'sorting & packaging' until 'loading of orders'.

5. Food Safety

- ✓ Consistent evaluation of HACCP by multidisciplinary HACCP team
- ✓ Traceability of fruit and packaging from producer to customer in accordance with legislation
- ✓ Purchase of food graded raw materials (fruit, packaging materials, excipients)
- ✓ Food safe services (transport, technical interventions, calibrations, pest control)
- ✓ Strengthen food safety culture among employees to encourage responsible behavior
- ✓ Whistleblower system for anonymous food safety reporting
- ✓ Guaranteed authenticity of the product
- ✓ Procedures and working methods (described in the quality manual), which evolve changing production conditions and legal requirements
- ✓ Registration of incidents, complaints and corrective measures
- ✓ Frequent internal- and external evaluations including adjustments
- ✓ Progress reporting to management and staff
- ✓ Verification of quality manual

Devos Group has appointed a qualified manager to lead the HACCP team and to guarantee food safety within Devos Group.

6. Purchasing policy

Devos Group purchases ethical and environmentally conscious production from GFSI certified suppliers ((Chain of Custody) Global G.A.P., BRC, IFS). The Devos Group supplier itself, also purchases from suppliers who meet this requirement. Demonstrable by GFSI certificates and the signed supplier declaration. Additional validations may involve GRASP, Smeta, Ecovadis, ISO26000 ... (ethical) and/or Leaf, Planetproof, ISO14000 ... (environmentally responsible).

Devos Group has a responsible manager on this topic who supervises the ethical and environmentally conscious purchasing policy within the company.

7. Environment/climate

In addition to an environmentally conscious purchasing policy, Devos Group is committed to the environment/climate in the following ways:

- ✓ Devos Group has all the correct permits and permissions granted by the government to carry out his activities in accordance with the applicable environmental/climate-related legislation.

- ✓ Devos Group investments in favor of the environment/climate: solar panels, heat recovery, LED lighting, box and tray folding machinery, ... result in major annual savings on electricity and fuel oil consumption.
- ✓ The electricity production of the solar panels is 2750 MWh/year. Because of this, Devos Group is a net supplier of electricity.
- ✓ Efficient cooling cells on ammonia (formerly climate-damaging cooling gases).
- ✓ Devos Group reduces the wastage thorough optimization of production processes, reducing food waste, using reusable packaging, switching from plastic to cardboard, transition to sticker-free products or biodegradable labels, fermenting biomass, etc.
- ✓ Revaluing waste flows
- ✓ Savings on water consumption and wastewater treatment.
- ✓ Grower sustainability survey: motivating fruit growers to enlarge efforts in favor of the environment/climate + monitoring current efforts in order to set achievable objectives.
- ✓ Autonomous transport company also owned by Devos Group with trucks that meet the Euro 6 standard.
- ✓ Internal transport with forklifts charged with green energy supplied by Devos' solar panels

Devos Group has a responsible manager who stays in touch with legal requirements, monitors consumption of water and electricity, explores and develops opportunities for improvement.

8. Health, safety and well-being

Risk analyses, annual evaluation, multi-year prevention plan with regard to health and safety, fire prevention & fire intervention file, company emergency plan, registration and reporting of accidents and incidents, evacuation exercise, reception, PPE, training, instructions, handling chemical agents, inspection of emergency lighting, tools, fire alarm, height equipment, ...

Devos Group has a responsible manager who develops the prevention policy to ensures health, safety and well-being at the workplace.

9. Human Resources (HR)

Responsible staff recruitment. Employment contract, employment regulations and employment in accordance with employment legislation. Offering correct remuneration, leave and rest days. Prohibition on withholding personal documents. No deductions from wages. Correct payroll administration. Payment in accordance with the agreements. Correct dismissal, payment at the end of employment, withdrawal of authorizations. Training plan. Working method written down in the HR procedure.

Devos Group has a HR manager who is responsible for the correct implementation of these items.

10. ETI Base Code

The Devos Group crew behave in an honest and respectful manner towards each other and business relations. Devos Group endorses the ETI Base Code, the base of this positive code of conduct:

- ✓ No forced labor

- ✓ Freedom of association and right to collective bargaining
- ✓ Safe and hygienic working conditions
- ✓ No child labor
- ✓ Living wages
- ✓ Working hours are not excessive
- ✓ No discrimination
- ✓ Regular employment
- ✓ No physical or mental abuse or harassment

Devos Group has a ETI manager who supervises the implementation of human rights and communicating the ETI principles to staff, suppliers and subcontractors. This code of conduct applies to all employees of Devos Group. Private and business interests are always subordinate to these ethical values. If you notice that the integrity of the company, his employees or business relations is at risk, you should report this to the responsible ETI manager. This person will be available for questions on this topic.

11. Business ethics

Devos Group has an ethical business policy:

- ✓ Fair competition & trade as determined by law
- ✓ Prevention against food fraud
- ✓ Anti-corruption
- ✓ Prevention against deliberate threats to food safety (food defense)

Private and business interests are always subordinate to these ethical values. Devos Group has a responsible who trains employees in business ethics and monitors the correct application of this ethical business policy. If you notice that the integrity of the company is being compromised, you should report this to the responsible person. An external auditor annually validates the legally required screening of the accounts, which did not reveal any anomalies.

12. Communication

- ✓ External communication for all stakeholders: the policy statement is available for everyone through the website www.devosgroup.com.
- ✓ Staff receive training at the start of employment that covers every topic in this policy statement. During annual refresh training this content is repeated for all staff. The policy statement is also included in the welcome brochure.
- ✓ Suppliers/subcontractors are informed personally when signing the supplier declaration.
- ✓ Confidential reporting through internal complaints system, internal confidential counselor (whistleblower) or via contact page on website.

Devos Group has appointed a confidential counselor who discusses complaints and suggestions internally and provides feedback on the results to the reporter. The internal suggestion box with form is available for every staff member.

13. GDPR

The management and security of the personal data of European citizens is regulated by the General Data Protection Regulation (GDPR)

- ✓ When processing the personal data of employees, Devos Group limits itself to those data that are necessary to comply with legal and social obligations, to set up a solid staff administration, to carry out payroll processing and administration properly and to have the correct contact details in case of emergency (accident - illness). The employee has the right to inquire his personal data saved by Devos Group , to consult this data and to have improvements made if necessary.
- ✓ When processing the data of business relations, Devos Group limits itself to the data that is necessary to comply with legal obligations and customer-specific requirements. The business partner always has the right to inquire his personal/business data saved by Devos Group, to consult this data and to have improvements made if necessary.
- ✓ The data of Devos Group or related companies, production-specific and/or customer-specific information, financial and/or accounting data may not be communicated publicly in any way without the permission of the directors. Directors want to be able to verify the accuracy of the information within the specific context before it is made public to prevent incorrect interpretation by media, governments, public organizations, customers, consumers, etc. Pay specific attention when using social media with regard to violating the privacy of Devos Group with regard to business operations what so ever.
- ✓ Employees are not authorized to enter into contractual obligations on behalf of Devos Group. Only contracts signed by a director are binding, unless written power of attorney has been granted.

Devos Group has a responsible who monitors the correct use of data by employees and business relations of the company.